

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
DAVID B. POPKIN INTERROGATORIES
DBP/USPS-94 and 96
(January 3, 2002)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to follow-up interrogatories DBP/USPS-94 and 96, filed by the David B. Popkin on December 17, 2001, on the grounds of that said interrogatories are procedurally improper.

DBP/USPS-94:

Interrogatory 94 requests information that was initially propounded in DBP/USPS-67. The Postal Service properly objected to interrogatory 67 on the grounds relevancy and burden. Following Mr. Popkin's Motion to Compel, the Postal Service correctly filed an opposition to said Motion. Until the Commission has ruled on the outstanding motions, it would be improper for the Postal Service to respond to this request.

DBP/USPS-96:

Interrogatory 96 purports to seek additional information original sought in OCA/USPS-299. However, the substance of DBP/USPS-96 is so unrelated to

that of OCA/USPS-299 that is inconceivably that Mr. Popkin would submit it under the guise of a follow-up. The discovery period for filing such an interrogatory has expired and the Postal Service objects on the grounds that this interrogatory is untimely.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Joseph K. Moore

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Joseph K. Moore

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3078, Fax -5402
January 3, 2002